



Aboriginal and Torres Strait
Islander Health Practice
Chinese Medicine
Chiropractic
Dental
Medical
Medical Radiation Practice
Nursing and Midwifery
Occupational Therapy
Optometry
Osteopathy
Pharmacy
Physiotherapy
Podiatry
Psychology

Australian Health Practitioner Regulation Agency

Response template: Public consultation - revised *Guidelines for mandatory notifications*

National Boards and the Australian Health Practitioner Regulation Agency (AHPRA) are seeking feedback about the revised *Guidelines for mandatory notifications*.

This response template is an alternative to providing your response through the online platform available on the consultation [website](#).

IMPORTANT INFORMATION

Privacy

Your response will be anonymous unless you choose to provide your name and/or the name of your organisation.

The information collected will be used by AHPRA to evaluate the revised guidelines. The information will be handled in accordance with AHPRA's privacy policy available [here](#).

Publication of responses

Published responses will include the name (if provided) of the individual and/or the organisation that made the response.

You must let us know if you do **not** want us to publish your response.

Please see the [public consultation papers](#) for more information about publication of responses.

Submitting your response

Please send your response to: AHPRA.consultation@ahpra.gov.au

Please use the subject line: Feedback on guidelines for mandatory notifications

Responses are due by: **6 November 2019**

General information about your response

Are you responding on behalf of an organisation?	
Yes	What is the name of your organisation? Australian Acupuncture and Chinese Medicine Association
Yes Chinese Medicine	Are you a registered health practitioner? Yes/ If yes, which profession(s)? Are you a student? No If yes, which profession?
We may need to contact you about your response. Please write your name and contact details below. (Skip if you wish to remain anonymous)	
Name (optional)	██████████
Contact details (optional)	████████████████████

Public consultation questions

Please ensure you have read the [public consultation papers](#) before providing feedback as the questions are specific to the revised Guidelines for mandatory notifications.

Use the corresponding text boxes to provide your responses. You do not need to answer every question if you have no comment.

1. How easy is it to find specific information in the revised guidelines

The layout of the guidelines makes it easy to find the necessary information

2. How relevant is the content of the revised guidelines?

The contents seem comprehensive and relevant

3. Please describe any content that needs to be changed or deleted in the revised guidelines.

The graded colour table in each section with low and high risk factors but nothing in between. The in-between area could potentially add an observe/monitor with potential to report or as there is sufficient detail and information in the rest of these section, the table needn't be included.

4. Should some of the content be moved out of the revised guidelines to be published on the website instead?

If yes, please describe what should be moved and your reasons why.

No

5. How helpful is the structure of the revised guidelines?

The structure provides several different ways of explaining the same information making it easy to use and understand. This could potentially decrease superfluous reporting

6. Do the revised guidelines clearly explain when a mandatory notification is required and when it is not?

Please explain your answer.

Yes, The structure provides several different ways of explaining the same information making it easy to use and understand. This could potentially decrease superfluous reporting

7. Are the flow charts and diagrams helpful?

Please explain your answer.

No

The graded colour table in each section with low and high risk factors but nothing in between. The in-between area could potentially add an observe/monitor with potential to report or as there is sufficient detail and information in the rest of these section, the table needn't be included.

8. Are the risk factor consideration charts helpful?

Please explain your answer.

Yes

There is a clear explanation of degrees of risk

9. Are the examples in the revised guidelines helpful?

Please explain your answer.

Yes

The examples provided give a useful variety of circumstances making it easier and clearer for appropriate notification

10. Should there be separate guidelines for mandatory notifications about students or should the information be included in guidelines about practitioners and students (but as a separate section)?

Please explain your answer.

Separate section about students

Two sets of guidelines could potentially cause confusion if student guidelines are mistakenly used for notification of practitioners

The revised guidelines explain that it is not an offence to fail to make a mandatory notification when required, but a National Board may take disciplinary action in this situation.

11. Is this made clear in the revised guidelines?

Please explain your answer.

Yes

The information is clearly explained and easy to understand so practitioners are aware of their responsibilities

12. Is there anything that needs to be added to the revised guidelines?

The revised guidelines appear to have covered the necessary aspects of what is required of treating and non treating practitioners when it comes to mandatory notifications

13. It is proposed that the guidelines will be reviewed every five years, or earlier if required.

Is this reasonable?

Please explain your answer.

Yes

Guidelines should be living documents to reflect changes and regulations in practice

14. Please describe anything else the National Boards should consider in the review of the guidelines.

How these guidelines will be promoted to employers especially in the private sector if the employers are not health professionals and just owners of private clinics/schools/aged care facilities etc (often absentee owners) that are providing a health service within their other business. The employer will be in name only in some of these circumstances and therefore potentially not have clear oversight or even knowledge of their responsibilities. Inappropriate behaviour/sexual misconduct in a school setting or aged care facilities, as examples, are areas of concern when external providers are contracted to provide a service within these facilities.

15. Please add any other comments or suggestions for the revised guidelines.

Nothing further to add

Thank you!

Thank you for participating in the consultation.

Your answers will be used by the National Boards and AHPRA to improve the Guidelines for mandatory notifications.